

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

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TERRANCE ATKINS, et al	*	CIVIL ACTION
	*	NO. 2:17-CV-00454
Plaintiffs,	*	
	*	
v.	*	JUDGE HICKS
	*	
PRIMORIS SERVICE CORPORATION	*	MAGISTRATE JUDGE KAY
and PRIMORIS ENERGY SERVICES	*	
CORPORATION	*	
	*	
Defendants.	*	

**JOINT MOTION FOR APPROVAL OF INDIVIDUAL SETTLEMENT AGREEMENTS
AND TO FILE SETTLEMENT AGREEMENTS UNDER SEAL**

NOW INTO COURT, through undersigned counsel, come Plaintiffs, Terrance Atkins, Gerald Woods, and Leandre Smith and Defendants, Primoris Service Corporation and Primoris Energy Services Corporation (collectively, the "Parties"), and, pursuant to 29 U.S.C. § 216 of the Fair Labor Standards Act (the "FLSA"), file this Joint Motion for Approval of Individual Settlement Agreements and to File Settlement Agreements Under Seal. For all of the reasons provided in the attached Memorandum in Support, the Parties request that the Court approve of Plaintiffs' settlement of their FLSA claims after permitting the Parties to file the Plaintiffs' settlement agreements under seal for in camera review.

Respectfully submitted,

**BAKER DONELSON BEARMAN
CALDWELL & BERKOWITZ, PC**

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**ATTORNEYS FOR DEFENDANT, PRIMORIS
SERVICE CORPORATION AND PRIMORIS
ENERGY SERVICES CORPORATION**

-AND-

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of August, 2018, a copy of the foregoing was filed with the Clerk of Court by using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

s/ Christopher G. Morris
CHRISTOPHER G. MORRIS